

**UNITED STATES DISTRICT COURT
OF THE DISTRICT OF OREGON
PORTLAND DIVISION**

<p>Disability Rights Oregon, METROPOLITAN PUBLIC DEFENDER SERVICES, INC., and A.J. MADISON,</p> <p style="text-align: right;"><i>Plaintiffs,</i></p> <p style="text-align: center;">v.</p> <p>DAVID BADEN, in his official capacity as head of the Oregon Health Authority, and DOLORES MATTEUCCI, in her official capacity as Superintendent of Oregon State Hospital,</p> <p style="text-align: right;"><i>Defendants.</i></p>	<p>Civ. No.: 3:02-cv-00339-MO (Lead Case) Case No.: 3:21-cv-01637-MO (Member Case)</p> <p>MOTION FOR EXPEDITED RULING ON MARION COUNTY’S SECOND MOTION TO INTERVENE</p>
--	---

MOTION FOR EXPEDITED RULING

I. INTRODUCTION

Proposed intervenor Marion County (“**the County**”) moves this Court for an expedited ruling on the Second Motion to Intervene. Specifically, the County requests this Court expedite consideration of the Second Motion to Intervene and issue a ruling by April 4, 2024 in order to allow the County to file a Notice of Appeal to the Ninth Circuit of the Court’s March 6, 2024 Order.

1. The County has filed contemporaneously with this motion its Second Motion to Intervene.

2. The County wants to file a Notice of Appeal attached to the Second Motion to Intervene.

That Notice of Appeal is due to be filed April 4, 2024.

3. The County requests an expedited schedule on the Second Motion to Intervene wherein

the response shall be due by the close of business on April 2, 2024, any reply by close of business on April 3, 2024, and that the Court rule on the Second Motion to Intervene promptly on April 4, 2024, in time for the County to file its Notice of Appeal.

V. CONCLUSION

The County respectfully ask this Court to conduct expedited ruling on its Second Motion for Intervention. Specifically, the County requests that this Court issue a ruling by April 4, 2024.

DATED this 29th day of March, 2024.

Respectfully submitted,

JANE E. VETTO
MARION COUNTY COUNSEL

/s/ Jane E. Vetto

Jane E. Vetto, OSB #914564
Marion County Legal Counsel
555 Court St. N.E.
P.O. Box 14500
Salem, OR 97309
Phone: 503-588-5220
Email: jvetto@co.marion.or.us
Attorney for Intervenor-Appellant

James Bopp, Jr., Ind. Bar No. 2838-84*

Eamon McCarthy Earls, Ind. Bar No. 38528-49*

*Admission *pro hac vice* forthcoming

THE BOPP LAW FIRM, PC

The National Building

1 South 6th Street Terre Haute,
Indiana 47807

Telephone: (812) 232-2434

Fax: (812) 235-3685

Email: jboppjr@aol.com;

emearls@bopplaw.com

Counsel for Proposed Intervenor